

1 Thomas C. Hurrell, State Bar No. 119876
2 E-Mail: thurrell@hurrellcantrall.com
3 Jordan S. Stern, State Bar No. 311527
4 E-Mail: jstern@hurrellcantrall.com
5 Nicole G. Ortega, State Bar No. 345882
6 E-Mail: nortega@hurrellcantrall.com
7 HURRELL CANTRALL LLP
8 725 S. Figueroa Street, Suite 3800
9 Los Angeles, California 90017
10 Telephone: (213) 426-2000
11 Facsimile: (213) 426-2020

12 Attorneys for Defendants, COUNTY OF LOS ANGELES, BLAKE RUNGE and
13 BRENDA ALCANTARA

14 LAW OFFICE OF DALE K. GALIPO
15 Dale K. Galipo, Esq. (SBN 144074)
16 dalekgalipo@yahoo.com
17 CooperAlison-Mayne (SBN 343169)
18 cmayne@galipolaw.com
19 21800 Burbank Blvd., Suite 310
20 Woodland Hills, CA 91367
21 Phone: (818)347-3333

22 RUBIN LAW OFFICE, P.C.
23 David Rubin (SBN 304744)
24 david@rubinlawoffice.com
25 2292 Faraday Ave, Suite 100
26 Carlsbad, CA 92008
27 Phone (619)719-1087

28 *Attorneys for Plaintiffs*

HURRELL CANTRALL LLP
725 S. FIGUEROA STREET, SUITE 3800
LOS ANGELES, CALIFORNIA 90017
TELEPHONE: (213) 426-2000

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
20

21 URSULA BYRAM, S.B. by and
22 through guardian ad litem TIMOTHY
23 BYRAM, N.B. by and through guardian
24 ad litem TIMOTHY BYRAM, and A.B.
25 by and through guardian ad litem
KAITLYN HUMENCHUK,
26 individually and as successors-in-
interest to Everett Byram,

27 Plaintiffs,
28

v.

21 COUNTY OF LOS ANGELES,
22 BLAKE RUNGE, and BRENDA

Case No. 2:23-cv-09285-KS
[Assigned to Hon. Karen L. Stevenson,
Courtroom 580]

PROPOSED JOINT EXHIBIT LIST
Final Pretrial Conference/Hearing on
Motions in Limine:

Date: January 21, 2025
Time: 10:00 a.m.

Trial Date: February 10, 2025

1 ALCANTARA,
 2 Defendants.

3

4 **TO THE HONORABLE COURT, ALL PARTIES AND THEIR**
 5 **ATTORNEYS OF RECORD:**

6 Pursuant to Local Rule 16-6 and Court's Order re Jury Trial, Plaintiffs
 7 URSULA BYRAM, S.B. by and through guardian ad litem TIMOTHY BYRAM,
 8 N.B. by and through guardian ad litem TIMOTHY BYRAM, and A.B. by and through
 9 guardian ad litem KAITLYN HUMENCHUK, individually and as successors-in-
 10 interest to Everett Byram and Defendants COUNTY OF LOS ANGELES, DEPUTY
 11 BLAK RUNGE, and DEPUTY BRENDA ALCANTARA (collectively "the Parties"),
 12 hereby submit their Joint Trial Exhibit List, which sets forth the exhibits one or all of
 13 the Parties may seek to offer as evidence at trial. The Parties reserve their respective
 14 rights to supplement and identify additional exhibits, including but not limited to for
 15 purposes of rebuttal and/or impeachment.

16

17 **JOINT EXHIBIT LIST**

No.	Description	Date Identified	Date Admitted
1.	Family Photos - PLT 000042-000105		
2.	Autopsy Report		
3.	Surveillance Video - PLT 000027.MOV		
4.	Surveillance Video - PLT 000028.3gp		
5.	Surveillance Video - PLT 000029.mp4		
6.	Photo reel - PLT 000030.mp4		
7.	Financial Documents - PLT 000031-000032.pdf, PLT 000033.pdf, PLT 000034.pdf, PLT 000106-140.pdf		
8.	Surveillance Video - PLT 000035.MOV		

1	9.	Surveillance Video - PLT 000036.MOV		
2	10.	Surveillance Video - PLT 000037.MOV		
3	11.	Home Video - PLT 000038.MOV		
4	12.	Home Video - PLT 000039.MOV		
5	13.	Home Video - PLT 000040.MOV		
6	14.	Home Video - PLT 000041.MOV		
7	15.	Helm Exhibit: Marked Maps		
8	16.	Helm Exhibit: BWC from Dep. Cervantes at quarter speed		
9	17.	Helm Exhibit: BWC from Dep. Cervantes at half speed		
10	18.	Helm Exhibit: Synced footage from Sgt. James and Dep. Cervantes at quarter speed		
11	19.	Helm Exhibit: Synced footage from Sgt. James and Dep. Cervantes at half speed		
12	20.	Helm Exhibit: Synced footage from Sgt. James and Dep. Cervantes at normal speed		
13	21.	Helm Exhibit: BWC from Dep. Lopez at quarter speed		
14	22.	Helm Exhibit: BWC from Dep. Lopez at half speed		
15	23.	Helm Exhibit: Synced footage from Deps. Lopez and Cervantes at quarter speed		
16	24.	Helm Exhibit: Synced footage from Deps. Lopez and Cervantes at half speed		
17	25.	Helm Exhibit: Synced footage from Deps. Lopez and Cervantes at normal speed		
18	26.	Helm Exhibit: BWC from Dep. Cervantes with shot timestamps marked		
19	27.	Helm Exhibit: BWC from Dep. Lopez with shot timestamps marked		
20	28.	Helm Exhibit: Synced footage with shot timestamps marked		
21	29.	Helm Exhibit: Combined multi-camera view of all angles		
22	30.	2024.02.07 - LA County Fire Report LAC23049534		
23	31.	Scene diagrams COLA000109–110		
24	32.	Autopsy Pictures		
25	33.	Los Angeles County Fire Department Report		
26				
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1	34.	American Medical Response Report		
2	35.	Antelope Valley Medical Records		
3	36.	Tax Documents (PLT 000031-000032.pdf)		
4	37.	Tax Documents (PLT 000033.pdf)		
5	38.	Tax Documents (PLT 000034.pdf)		
6	39.	Bank Statements (PLT 000106-PLT 000140)		
7	40.	Pictures of Deputies after incident COLA 000684 - COLA 000737		
8	41.	Pictures of Ursula Byram after incident COLA 000738 - COLA 000746		
9	42.	Picture of scene COLA 000747 - COLA 001152		
10	43.	BWC: COLA 000680		
11	44.	BWC: COLA 000681		
12	45.	BWC: COLA 000679		
13	46.	BWC: COLA 000659		
14	47.	BWC: COLA 000660		
15	48.	BWC: COLA 000661		
16	49.	BWC: COLA 000662		
17	50.	BWC: COLA 000663		
18	51.	BWC: COLA 000664		
19	52.	BWC: COLA 000665		
20	53.	BWC: COLA 000666		
21	54.	BWC: COLA 000667		
22	55.	BWC: COLA 000668		
23	56.	BWC: COLA 000669		
24	57.	BWC: COLA 000670		
25	58.	BWC: COLA 000671		
26	59.	BWC: COLA 000672		
27	60.	BWC: COLA 000673		
28	61.	BWC: COLA 000674		
	62.	BWC: COLA 000677		
	63.	BWC: COLA 000678		
	64.	BWC: COLA 000682		
	65.	BWC: COLA 000683		
	66.			
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	69.	February 10, 2023, Los Angeles County Sheriff's Department Incident Report		

1	(COLA000001-000013, 000017, 000035-000044, 000049-000054)		
2			
3	70. February 10, 2023, Los Angeles County Sheriff's Department Witness transportation consent forms (COLA000014-000016, 000111-000113)		
4			
5	71. February 10, 2023, Los Angeles County Sheriff's Department Major Incident Log (COLA000018-000021, 000045-000048)		
6			
7	72. February 10, 2023, PM Shift In-Service, Palmdale (COLA000022-000023)		
8			
9	73. February 10, 2023, Deputy Daily Worksheet (COLA000024-000026)		
10			
11	74. February 10, 2023, Shift Date Unit History Report - Palmdale (COLA000027-000029)		
12			
13	75. February 10, 2023, Los Angeles County Sheriff's Department Detective Division – Homicide Bureau Table of Contents (COLA000030-000034)		
14			
15	76. February 10, 2023, Los Angeles County Sheriff's Department Supplemental Report (COLA000055-000110)		
16			
17	77. Consolidated Criminal History Report of Everett Byram (COLA000114-000119)		
18			
19	78. Temporary Restraining Order against Everett Byram and Corresponding Court Documents (COLA000120-000149)		
20			
21	79. August 30, 2022, Los Angeles County Sheriff's Department Incident Report (COLA000150-000153, 000156-000159, 001164-001169)		
22			
23	80. August 30, 2022, Los Angeles County Sheriff's Department Application for Assessment, Evaluation, and Crisis Intervention Interview or Placement for Evaluation and Treatment (COLA000154-000155)		
24			
25	81. February 20, 2023, Medical Records from Antelope Valley Medical Center for Mr.		
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1	Everett Byram (COLA000160 – 00180, 000209 - 000220)		
2	82. February 10, 2023, Mr. Everett Byram's EMT Records (COLA000181 – 000208)		
3	83. August 30, 2022, Medical Records from Antelope Valley Medical Center for Mr. Everett Byram (COLA000221 – 000318)		
4	84. Search Warrant Return and Inventory (COLA000319, 000321-000371)		
5	85. Receipt for Seized Property and Notice for Retrieving Property (COLA000320)		
6	86. Los Angeles County Sheriff's Department Scientific Services Bureau – Biological Evidence Examination Report (COLA000372-000373)		
7	87. February 10, 2023, Los Angeles County Sheriff's Department Crime Scene Investigation Report (COLA000374 – 000378)		
8	88. Los Angeles County Sheriff's Department Scientific Services Bureau – DNA Analysis Report Supplemental (COLA000379-000381)		
9	89. Los Angeles County Sheriff's Department Scientific Services Bureau –Laboratory Examination Report (COLA000382-000333)		
10	90. Autopsy Report (COLA000384 – 000404)		
11	91. February 10, 2023, Plaintiff Ursula Byram's 911 Call Transcripts (COLA000405 – 000414)		
12	92. Plaintiff Ursula Byram's Interview Transcripts (COLA000415 – 000456)		
13	93. Deputy Juan Lopez Munoz's Interview Transcripts (COLA000457 – 000512)		
14	94. Deputy Brandon Cervantes' Interview Transcripts (COLA000513 – 000558)		
15	95. Defendant Deputy Blake Runge's Interview Transcripts (COLA000559 – 000601)		
16	96. Sergeant Cory James' Interview Transcripts (COLA000602 – 000634)		
17	97. Sergeant Matthew Pereida Interview Transcripts (COLA000635 – 000658)		

1	98.	February 10, 2023, Los Angeles County Sheriff's Department Deputy Body Worn Video (COLA000659-000683)		
2	99.	February 10, 2023, Los Angeles County Sheriff's Department Deputy Body Worn Video re Deputy Alcantara taking Plaintiff N.B. to Plaintiff Ursula Byram (COLA000660)		
3	100.	February 10, 2023, Los Angeles County Sheriff's Department Deputy Body Worn Video re Paramedic providing Aid to Mr. Everett Byram and Transporting him (COLA000661)		
4	101.	February 10, 2023, Los Angeles County Sheriff's Department Deputy Body Worn Video re Plaintiff N.B. sleeping and Plaintiff S.B. unit Plaintiff Ursula Byram (COLA000662)		
5	102.	February 10, 2023, Deputy Brian Venegas' Body Worn Video (COLA000663)		
6	103.	February 10, 2023, Deputy Brenda Alcantara's Body Worn Video (COLA000664-000668)		
7	104.	February 10, 2023, Los Angeles County Sheriff's Department Deputy Body Worn Video re Plaintiff Ursula Byram Signing Transportation Forms (COLA000662)		
8	105.	February 10, 2023, Deputy Brandon Cervantes' Body Worn Video (COLA000677, 000680)		
9	106.	February 10, 2023, Deputy Blake Runge's Body Worn Video (COLA000678, 000679)		
10	107.	February 10, 2023, Deputy Juan Lopez-Munoz's Body Worn Video (COLA000681)		
11	108.	February 10, 2023, Sergeant Cory James' Body Worn Video (COLA000682)		
12	109.	Pictures of Deputy Brandon Cervantes after the February 10, 2023, Incident (COLA000684-000691, 000734-737)		
13	110.	Pictures of Sergeant Cory James after the February 10, 2023, Incident (COLA000692-000698)		

1	111.	Pictures of Defendant Deputy Blake Runge after the February 10, 2023, Incident (COLA000699-000715)		
2	112.	Pictures of Defendant Deputy Blake Runge's Service Pistol and ammunition after the February 10, 2023, Incident (COLA000716-000722)		
3	113.	Pictures of Deputy Juan Lopez-Munoz after the February 10, 2023, Incident (COLA000723-000733)		
4	114.	Pictures of Plaintiff Ursula Byram after the February 10, 2023, Incident (COLA000738-000746)		
5	115.	February 10, 2023, Scene Pictures (COLA000748-001152)		
6	116.	February 10, 2023, Plaintiff Ursula Byram's First 911 Call (COLA001153)		
7	117.	County of Los Angeles Sheriff's Department Certification of Records (COLA001154-001157)		
8	118.	February 10, 2023, Dispatch Calls (COLA001158-001163)		
9	119.	August 30, 2022, Pictures of Mr. Everett Byram (COLA001170-001171)		
10	120.	August 30, 2022, Deputy Brandon Cervantes' Body Worn Video (COLA001172)		
11	121.	August 30, 2022, Deputy Huston Body Worn Video (COLA001173)		
12	122.	August 30, 2022, Detective Benjamin Tanner's Body Worn Video (COLA001174)		
13	123.	August 30, 2022, Dispatch Calls (COLA001175-001176, 001178)		
14	124.	August 30, 2022, Sergeant Cabrerra Scene Video (COLA001177)		
15	125.	August 30, 2022, Sergeant Cabrerra Interview of Mr. Everett Byram (COLA001179)		
16	126.	August 30, 2022, Audio of Sergeant Cabrerra Interviewing Witness Sosa (COLA001180)		
17	127.	February 10, 2023, Plaintiff Ursula Byram's Second 911 Call (COLA001181)		
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3 DATED: November 12, 2024 HURRELL CANTRALL LLP

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6 By: */s/ Jordan S. Stern*
7 THOMAS C. HURRELL
8 JORDAN S. STERN
9 NICOLE G. ORTEGA
10 Attorneys for Defendants, COUNTY OF
11 LOS ANGELES, BLAKE RUNGE and
12 BRENDA ALCANTARA

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13 DATED: November 12, 2024 LAW OFFICES OF DALE K. GALIPO

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15 By: */s/ Cooper Alison-Mayne*

16 Dale K. Galipo
17 Cooper Alison-Mayne
18 Attorneys for Plaintiffs